



# County of San Diego

**MARK WARDLAW**  
DIRECTOR  
PHONE (858) 694-2962  
FAX (858) 694-2555

PLANNING & DEVELOPMENT SERVICES  
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123  
[www.sdcounty.ca.gov/pds](http://www.sdcounty.ca.gov/pds)

**DARREN GRETLER**  
ASSISTANT DIRECTOR  
PHONE (858) 694-2962  
FAX (858) 694-2555

## **Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183**

**Date:** July 28, 2016  
**Project Title:** Shellstrom Tentative Parcel Map  
**Record ID:** PDS2015-TPM-21218, LOG NO. PDS2015-ER-14-19-001  
**Plan Area:** Jamul Dulzura Subregional Plan Area  
**GP Designation:** Semi-Rural (SR-2)  
**Density:** N/A  
**Zoning:** Rural Residential (RR)  
**Min. Lot Size:** 2 Acres  
**Special Area Reg.:** N/A  
**Lot Size:** 8.7 Acres  
**Applicant:** Douglas Shellstrom, Property Owner (619) 719-2241  
**Staff Contact:** Michelle Chan - (858) 495-5428  
[Michelle.Chan@sdcounty.ca.gov](mailto:Michelle.Chan@sdcounty.ca.gov)

### **Project Description**

The project is a minor subdivision of an 8.7-acre property (APN 519-200-05) into two parcels. The project site is located along Lyons Valley Road in the Jamul Dulzura Subregional Planning Area within unincorporated San Diego County. Access to the site would be provided by a private road connecting to Lyons Valley Road. Water would be provided by the Otay Water District and sewer services would be provided by on-site septic systems. Earthwork will be balanced on site, consisting of approximately 20 cubic yards of cut and 20 cubic yards of fill. The project site is subject to the Semi-Rural General Plan Regional Category, Land Use Designation Semi-Rural (SR-2). Zoning for the site is Rural Residential (RR). The project is consistent with density and lot size requirements of the General Plan and Zoning Ordinance.

### **Overview**

California Public Resources Code section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on which the project would be located,

and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent, (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

### **General Plan Update Program EIR**

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

The GPU EIR was certified in conjunction with adoption of the GPU on August 3, 2011. The GPU EIR comprehensively evaluated environmental impacts that would result from Plan implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

### **Summary of Findings**

The Shellstrom Tentative Parcel Map TPM-21218 is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the proposed project, identified applicable mitigation measures necessary to reduce project specific impacts, and the project implements these mitigation measures (see [http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_7.00 - Mitigation Measures 2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures.

A comprehensive environmental evaluation has been completed for the project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

In accordance with CEQA Guidelines §15183, the project qualifies for an exemption because the following findings can be made:

**1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**

The project would subdivide an 8.7-acre property into two total parcels, which is consistent with the Semi-Rural (SR-2) development density established by the General Plan and the certified GPU EIR.

**2. There are no project specific effects which are peculiar to the project or its site, and which the GPU EIR failed to analyze as significant effects.**

The subject property is no different than other properties in the surrounding area, and there are no project specific effects which are peculiar to the project or its site. The project site is located in an area developed with similarly sized residential lots with associated accessory uses. The property does not support any peculiar environmental features, and the project would not result in any peculiar effects.

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to biological resources, cultural resources, and geology and soils. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this project.

**3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.**

The proposed project is consistent with the density and use characteristics of the development considered by the GPU EIR and would represent a small part of the growth that was forecast for build-out of the General Plan. The GPU EIR considered the incremental impacts of the proposed project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

**4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.**

As explained in the 15183 exemption checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

**5. The project will undertake feasible mitigation measures specified in the GPU EIR.**

As explained in the 15183 exemption checklist below, the project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through project design, compliance with regulations and ordinances, or through the project's conditions of approval.

Signature

**Michelle Chan**

Printed Name

**July 28, 2016**

Date

**Project Manager**

Title

## **CEQA Guidelines §15183 Exemption Checklist**

### **Overview**

This checklist provides an analysis of potential environmental impacts resulting from the proposed project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the project would result in a potentially significant impact triggering additional review under Guidelines section 15183.

- Items checked “Significant Project Impact” indicates that the project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.
- Items checked “Impact not identified by GPU EIR” indicates the project would result in a project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.
- Items checked “Substantial New Information” indicates that there is new information which leads to a determination that a project impact is more severe than what had been anticipated by the GPU EIR.

A project does not qualify for a §15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of staff’s analysis of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and technical studies used to support the analysis is attached in Appendix A. Appendix B contains a list of GPU EIR mitigation measures.

### **AESTHETIC RESOURCES**

The GPU EIR determined there was a potential to result in impacts to aesthetic resources from the development of land uses proposed under the GPU, including the potential for direct and cumulative impacts and significant impacts to visual character, scenic resources, and light and glare from future development. General Plan Update policies and mitigation measures would reduce impacts to aesthetic resources but not to below a level of significance. These impacts were analyzed in the GPU EIR Aesthetic Resources Chapter and mitigation measures were proposed.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>1. AESTHETICS</b> – Would the Project:			
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

- 1(a) No. The project would be visible from public roads and trails; however, the site is not located within a viewshed of a scenic vista.
- 1(b) No. The property is not located within the viewshed of a state scenic highway. Although the site contains some rock outcroppings, the project site would not modify the outcroppings through development of the property. In addition, building pads are set back approximately 300 feet from the road, and the topography of the site and existing vegetation would screen the view of structures from Lyons Valley Road, which is a County scenic highway.
- 1(c) No. The project would be consistent with existing community character. The project is located within the Jamul-Dulzura Community Planning Area, in an area characterized by rural residential and open space uses. Minimal grading is proposed and building pads are set back approximately 300 feet from the road, and the topography of the site and existing vegetation would screen the view of structures from Lyons Valley Road. Therefore, the project would not substantially degrade the visual quality of the site or its surroundings.
- 1(d) No. Residential lighting would be required to conform with the County's Light Pollution Code to prevent spillover onto adjacent properties and minimize impacts to dark skies.

### Conclusion

As discussed above, the project would not result in any significant impacts to aesthetics; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

### AGRICULTURAL/FORESTRY RESOURCES

The GPU EIR determined there was a potential to result in impacts to agricultural resources from the development of land uses proposed under the GPU, including the potential for direct and cumulative impacts and significant impacts from conversion of agricultural resources and land use conflicts from future development. General Plan Update policies and mitigation measures would reduce impacts to agricultural resources but not to below a level of

significance. These impacts were analyzed in the GPU EIR Agricultural Resources Chapter and mitigation measures were proposed.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>2. Agriculture/Forestry Resources</b> – Would the Project:			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

- 2(a) No. The project site and surrounding properties do not support any Farmland of Local Importance, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance that could be converted to non-agricultural uses as a result of the project.
- 2(b) No. The project site is not located within or adjacent to a Williamson Act contract or agriculturally zoned land. As such, the project will not conflict with existing zoning for agricultural use, or a Williamson Act contract.
- 2(c) No. There are no timberland production zones on or near the property. As such, the project will not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.
- 2(d) No. The project site is not located near any forest lands. As such, the project will not result in a loss of forest land or the conversion of forest land to non-forest uses.
- 2(e) No. The project site is not located near any important farmlands or active agricultural production areas. As such, the project will not result in the conversion of Important Farmland or other agricultural resources, to non-agricultural use.

**Conclusion**

As discussed above, the project would not result in any significant impacts to agricultural resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

**AIR QUALITY**

Air quality emissions generated by the project would be from traffic (20 additional ADT) and from construction. Grading for the project is estimated at only 20 cubic yards of cut and fill. The GPU EIR determined there was a potential to result in significant direct and cumulative impacts to air quality from the development of land uses proposed under the GPU, including the potential for air quality violations, an increase in non-attainment criteria pollutants, and impacts to sensitive receptors from future development. General Plan Update policies and mitigation measures would reduce impacts to aesthetic resources but not to below a level of significance. These impacts were analyzed in the GPU EIR Air Quality Chapter and mitigation measures were proposed.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>3. Air Quality – Would the Project:</b>			
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

- 3(a) No. The project proposes development that was anticipated and considered by SANDAG growth projections used in development of the RAQS and SIP. As such, the project would not conflict with either the RAQS or the SIP. In addition, the operational emissions from the project are below screening levels, and will not violate any ambient air quality standards.
- 3(b) No. Grading operations associated with the construction of the project would be subject to the Grading Ordinance, which requires the implementation of dust control measures. Emissions from the construction phase would be minimal, temporary and localized,

resulting in pollutant emissions below the screening level criteria established by County air quality guidelines for determining significance. Only minimal grading of 20 cubic yards is proposed. In addition, the vehicle trips generated from the project will result in approximately 20 new Average Daily Trips (ADTs). According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADT are below the screening-level criteria established by the guidelines for criteria pollutants. As such, the project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

- 3(c) No. The project would contribute PM<sub>10</sub>, NO<sub>x</sub>, and VOCs emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b) above).
- 3(d) No. The project will introduce two additional residential homes, which are considered new sensitive receptors; however, the project site is not located within a quarter-mile of any identified point source of significant emissions. Similarly, the project does not propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and will not place sensitive receptors near any carbon monoxide hotspots.
- 3(e) No. The project could produce objectionable odors during construction and operation; however, these substances, if present at all, would only be in trace amounts (less than 1 µg/m<sup>3</sup>).

### Conclusion

As discussed above, the project would not result in any significant impacts to air quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

### BIOLOGICAL RESOURCES

The GPU EIR analysis indicated there would be the potential for direct and/or indirect impacts to biological resources from the development of land uses proposed under the GPU. General Plan Update policies and mitigation measures would reduce impacts to special status species, riparian habitats and other sensitive communities, and wildlife movement corridors but not to below a level of significance. These impacts were analyzed in the GPU EIR Biological Resources Chapter and mitigation measures were proposed.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>4. Biological Resources – Would the Project:</b>			
Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

☐ ☐ ☐

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

☐ ☐ ☐

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☐ ☐ ☐

e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

☐ ☐ ☐

## Discussion

4(a) No. Biological resources on the project site were evaluated in a Biological Resources Letter Report prepared by Vincent Scheidt dated November 2015. The project site supports approximately 2.8 acres of Diegan coastal sage scrub, 0.4 acre of chamise chaparral, and 5.8 acres of disturbed/developed habitat. Diegan coastal sage scrub and chamise chaparral are considered sensitive biological resources in San Diego County, as defined by the County's Guidelines for Determining Significance for Biological Resources. Two sensitive plant species were observed on the property during field surveys: Engelmann oak (*Quercus engelmannii*) and San Diego County viguiera (*Viguiera laciniata*). Development of the project could result in impacts to two mature Englemann oaks and several hundred specimens of San Diego County viguiera. No sensitive animal species were observed on site, although there are several sensitive species with high potential to occur on site, including red-shouldered hawk (*Buteo lineatus*) and Cooper's hawk (*Accipiter cooperii*). Development of the proposed project could result in direct impacts to sensitive plant species and raptor foraging habitat through removal of existing vegetation onsite.

As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of project-specific mitigation measures. The GPU EIR identified these mitigation measures as Bio-1.6 and Bio-1.7. Conservation of onsite sensitive habitat will be addressed through dedication of an open space easement, or conservation of 2.8 acres of Tier II habitat (Diegan coastal sage scrub) and 0.2 acre of Tier III habitat (chamise chaparral) within a County-approved mitigation bank. No specific mitigation for impacts to sensitive plant or animal species is required, since the loss of these sensitive species would presumably be compensated for by the conservation of offsite habitat lands. Additionally, the project will be conditioned to avoid site brushing, grading, and/or removal of native vegetation within 300 feet of any potential migratory songbird or raptor nesting location during the breeding

season (January 1 through August 31), pursuant to the Migratory Bird Treaty Act; Sections 3503, 3503.5, and 3513 of the California Fish and Game code; and the Endangered Species Act. Therefore, impacts to sensitive habitat and/or species would be mitigated to less than significant.

- 4(b) No. According to the Biological Letter Resources Report dated November 2015 (prepared by Vincent Scheidt), two minor drainage features cross the project site. Neither drainage supports a predominance of hydrophytic vegetation, hydric soils, or suitable hydrology characteristic of wetlands or jurisdictional waters, or has areas exhibiting an ordinary high water mark or a bed and bank. Diegan coastal sage scrub and chamise chaparral are sensitive habitats identified on the site. As detailed in response a) above, direct and indirect impacts to sensitive natural communities identified in the Resource Protection Ordinance (RPO), Natural Community Conservation Plan (NCCP), Fish and Wildlife Code, and Endangered Species Act would be avoided through the dedication of an open space easement over the existing sensitive habitat, or mitigated through implementation of offsite habitat purchases. Therefore, the project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community.
- 4(c) No. The project site does not contain wetlands as defined by Section 404 of the Clean Water Act, including, but not limited to, marsh, vernal pool, stream, lake, river or water of the U.S., that could potentially be impacted through direct removal, filling, hydrological interruption, diversion or obstruction by the proposed development. The Biological Resources Letter Report dated November 2015 (prepared by Vincent Scheidt) assessed the project site for the presence of state and federal jurisdictional wetlands. It was determined that although there are two upland swales located within the project site, a predominance of hydrophytic vegetation, hydric soils, or suitable wetland hydrology is not supported. Therefore, no impacts will occur to wetlands defined by Section 404 of the Clean Water Act and under the jurisdiction of the Army Corps of Engineers.
- 4(d) No. The Biological Resources Letter Report dated November 2015 (prepared by Vincent Scheidt) indicated that the northern and eastern property edges may serve as a wildlife corridor along with adjoining properties; however, the site is not part of a regional linkage/corridor as identified on MSCP maps nor is it in an area considered regionally important for wildlife dispersal. Moreover, one of the mitigation options for potential impacts to existing onsite native vegetation would be to dedicate open space easement over the northern and eastern property edges where wildlife movement is expected to occur and could be maintained. Therefore, the proposed project would not substantially interfere with the movement of native resident or migratory fish or wildlife species, the use of an established native resident or migratory wildlife corridors, and the use of native wildlife nursery sites and impacts would be less than significant.
- 4(e) No. Refer to the attached Ordinance Compliance Checklist for further information on consistency with any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional, or state habitat conservation plan, including Habitat Management Plans, Special Area Management Plans (SAMP), or any other local policies or ordinances that protect biological resources, including the Multiple Species Conservation Program (MSCP), Biological Mitigation Ordinance, Resource Protection Ordinance (RPO), and Habitat Loss Permit (HLP).

**Conclusion**

The project could result in potentially significant impacts to biological resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

**CULTURAL RESOURCES**

The GPU EIR analysis indicated there would be the potential for direct and/or indirect impacts to cultural resources from the development of land uses proposed under the GPU, including significant impacts to paleontological and archaeological resources from potential ground-disturbing activities associated with future development. General Plan Update policies and mitigation measures would reduce impacts to historic, archaeological, unique geological, paleontological, and to human remains but not to below a level of significance.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>5. Cultural Resources – Would the Project:</b>			
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Directly or indirectly destroy a unique paleontological resource or site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Cause a substantial adverse change in the significance of a tribal cultural resource?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- 5(a) No. Based on an analysis of records maintained by the County and the South Coastal Informational Center, it has been determined that there are no impacts to historical resources because they do not occur within the project site.
- 5(b) No. Based on an analysis of records (including archaeological surveys) maintained by the County and the South Coastal Informational Center, it has been determined that there are no impacts to archaeological resources because they do not occur within the project site.

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through compliance with the Grading Ordinance and through conformance with the County's Cultural Resource Guidelines if resources are encountered. Although no resources were identified, there is the potential for the presence of subsurface deposits. The project will be conditioned with archaeological monitoring (Cul-2.5) that includes the following requirements:

- Pre-Construction
  - Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements.
- Construction
  - Monitoring. Both the Project Archaeologist and Kumeyaay Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor. Both the Project Archaeologist and Kumeyaay Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources
  - If cultural resources are identified:
    - Both the Project Archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
    - The Project Archaeologist shall contact the County Archaeologist.
    - The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American shall determine the significance of discovered resources.
    - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
    - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
    - If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for

non-unique cultural resources. The preferred option is preservation (avoidance).

- Human Remains.
  - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
  - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin.
  - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
  - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
  - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

- Rough Grading
  - Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
- Final Grading
  - A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy.
- Disposition of Cultural Material.
  - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively have been repatriated to a culturally affiliated tribe.
  - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

5(c) No. The project site is classified as moderate for unique geologic features (rock outcrops) that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources. The area in which resources are potentially located will be placed in open space which is also for the protection of biological resources and steep slopes.

5(d) No. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on Cretaceous Plutonic formations that have a no potential to contain unique paleontological resources.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: conformance with the County's Paleontological Resource Guidelines and the Grading Ordinance if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1 and Cul-3.2.

- 5(e) No. Based on an analysis of records (including archaeological surveys) maintained by the County and the South Coastal Information Center, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains.
- 5(f) No. Based on an analysis of records, cultural surveys of the property, and Native American consultation, it has been determined that tribal cultural resources are not present within the project site.

Native American consultation included a Sacred Lands check which was initiated with the Native American Heritage Commission (NAHC) on October 16, 2015. The Sacred Lands check conducted by the NAHC resulted in negative findings. The NAHC provided a list of 13 tribes/organizations (Barona, Campo, Ewiiapaayp, Inaja, Jamul, Kwaaymii, La Posta, Manzanita, Mesa Grande, San Pasqual, Santa Ysabel, Sycuan, Viejas) who may have information related to the subject parcel. The 13 tribes were contacted on April 4, 2016, and Viejas responded. Requests made by these tribes include:

1. Copy of the cultural study; and
2. A site visit.

Outreach with Viejas was conducted, the project is conditioned with archaeological monitoring, and Viejas is included in the distribution list for notification.

## **Conclusion**

The project could result in potentially significant impacts to cultural resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

## **GEOLOGY AND SOILS**

The GPU EIR determined there was a potential to result in impacts from geology and soils during development of land uses proposed under the GPU, but direct and cumulative impacts were found to be less than significant. Future development under the General Plan Update would be required to comply with State and local building standards and regulations, including the California Building Code and County-required geotechnical reconnaissance reports and

investigations. Compliance with such regulations would reduce impacts associated with on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse to a less than significant level. This information was analyzed in the GPU EIR Geology and Soils Chapter and it is applicable to the Shellstrom Tentative Parcel Map project.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>6. Geology and Soils – Would the Project:</b>			
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, and/or landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

- 6(a)(i) No. The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault.
- 6(a)(ii) No. To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. Compliance with the California Building Code and the County Building Code will ensure that the project will not result in a significant impact.
- 6(a)(iii) No. The project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. In addition, the site is not underlain by poor artificial fill or located within a floodplain.
- 6(a)(iv) No. The site is not located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards.
- 6(b) No. According to the Soil Survey of San Diego County, the soils on-site are classified as Cieneba very rocky coarse sandy loam, 30 to 75 percent slopes (CmrG), and Cieneba-

Fallbrook rocky sandy loams, 30 to 65 percent slopes, eroded (CnG2), both of which have a soil erodibility rating of severe. However, the project will not result in substantial soil erosion or the loss of topsoil because the project will be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which will ensure that the project would not result in any unprotected erodible soils, will not alter existing drainage patterns, and will not develop steep slopes. Additionally, the project will be required to implement Best Management Practices (BMPs) during construction to prevent fugitive sediment.

- 6(c) No. The project site is adjacent to an area characterized by steep hillsides containing scattered natural rock outcrops. According to the Geology Report prepared by Michael W. Hart, Engineering Geologist, on April 30, 2015, both Parcels 1 and 2 slope up to the north with varying slope inclinations, with an average slope gradient of 34.81% at Parcel 1 and 39.68% at Parcel 2. Parcel 1 is characterized by a few moderate sized rocks exposed on the cut slope that vary in size up to approximately six feet in diameter, scattered natural rock outcrops in the central less steep portions of the property, and isolated rock outcrops on the steepest portion of the natural slope near the northern boundary. An approximately four foot diameter boulder is located on the lower western portion of the slope on Parcel 1 that appears to rest on the underlying soils, and may become easily dislodged by erosion or intense storm activity. All of the other boulders located on the slope to the north of Parcel 1 appear to be well-seated and would not be subject to dislodging. In addition, the natural slope on Parcel 2, as well as the cut slope along the north side of the building pad, are free of significant rock outcrops. Accordingly, there are no potential hazards associated with falling rocks at Parcel 2.

Due to the potential rock fall hazard posed by the four foot diameter boulder above Parcel 1, the Geology Report recommends that this boulder be removed or placed in a more stable position on the building pad. As discussed in the GPU EIR and the County's Guidelines for Determining Significance, Geologic Hazards, the County endorses three mitigation techniques for reducing landslide impacts: 1) avoiding the hazard; 2) protecting the site from the hazard; and 3) reducing the hazard to an acceptable level. Examples of County endorsed mitigation methods include building developments sufficiently far away from the landslide threat so that it would not be affected if the slope fails; requiring catchments and/or protective structures such as basins, embankments, diversion or barrier walls, and fences; eliminating or reducing the slope, removing the unstable soil and rock materials, or applying one or more appropriate slope stabilization methods (such as buttress fills, sub drains, soil nailing, or crib walls). For deep-seated slope instability, strengthening the design of the structure (e.g., reinforced foundations) is not considered by the County to be an adequate mitigation measure. Therefore, removal and/or relocation of the boulder above Parcel 1 is consistent with the GPU EIR, and would ensure that impacts would be less than significant.

- 6(d) No. The project site is not located within a High Shrink Swell Zone, nor are the on-site soils (CmrG and CnG2) considered to be expansive. In addition, the project will not result in a significant impact because compliance with the Building Code and implementation of standard engineering techniques will ensure structural safety.
- 6(e) No. The project will rely on public water systems. The project would discharge domestic wastewater to on-site wastewater systems (OSWS), also known as septic systems. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCB to authorize a local



public agency to issue permits for OSWS “to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained.” The RWQCB with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits through the County and within the incorporated cities. DEH has reviewed the OSWS lay-out for the project and approved the project’s OSWS on September 24, 2015. Therefore, the project has soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems as determined by the authorized, local public agency. In addition, the project will comply with the San Diego County Code of Regulatory Ordinances, Title 6, Div. 8, Chap. 3, Septic Tanks and Seepage Pits.

### Conclusion

As discussed above, the project would not result in any significant impacts to/from geology/soils; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>7. Greenhouse Gas Emissions – Would the Project:</b>			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

7(a) No. The project would produce GHG emissions through construction activities, vehicle trips, and residential fuel combustion. However, the project falls below the screening criteria that were developed to identify project types and sizes that would have less than cumulatively considerable GHG emissions (i.e., the project would result in less than 50 single-family residential units).

The California Air Pollution Control Officers Association uses screening thresholds for determining the need for additional analysis. Screening thresholds are recommended based on various land use densities and project types. Projects that meet or fall below the screening thresholds are expected to result in 900 MT/year of GHG emissions or less and would not require additional analysis. The 50 unit standard for single-family residential land use that corresponds to the 900 MT/year of GHG emissions would apply to the proposed project.

The project proposes a two parcel subdivision that would allow for a maximum of two dwelling units, and therefore would fall below the screening criteria of 50 units. For projects of this size, it is presumed that the construction and operational GHG emissions would not exceed 900 MT CO<sub>2</sub>e per year, and there would be a less-than cumulatively considerable impact. The project does not involve unusually extensive construction and does not involve operational characteristics that would generate unusually high GHG emissions.

- 7(b) No. As described above, the project would not result in a cumulatively considerable contribution to global climate change. As such, the project would be consistent with County goals and policies included in the County General Plan that address greenhouse gas reductions. Therefore, the project would be consistent with emissions reduction targets of Assembly Bill 32, the Global Warming Solutions Act. Thus, the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gas emissions.

### Conclusion

As discussed above, the project would not result in any significant impacts to greenhouse gas emissions; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

### HAZARDS AND HAZARDOUS MATERIALS

The GPU EIR analysis indicated there would be the potential for direct and cumulative impacts to humans from hazards with development of land uses proposed under the GPU. However, future development under the General Plan Update would be required to comply with federal, State and local standards and regulations, and all potential impacts have been reduced to less than significant, consistent with the GP EIR.

General Plan Update policies and mitigation measures would reduce impacts from hazardous materials and vectors to less than significant. These impacts were anticipated in the GPU EIR Hazards Chapter and mitigation measures were proposed. The mitigation resulted in a less than significant impact associated with existing hazardous materials.

The GPU EIR identifies significant impacts associated with exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. The General Plan Update policies and mitigation measures would reduce impacts from wildland fire but not to below a level of significance.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>8. Hazards and Hazardous Materials – Would the Project:</b>			
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

☐ ☐ ☐

e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

☐ ☐ ☐

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

☐ ☐ ☐

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

☐ ☐ ☐

h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

☐ ☐ ☐

### Discussion

8(a) No. The project will not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. In addition, the project does not propose to demolish any existing structures onsite which could produce a hazard related to the release of asbestos, lead based paint or other hazardous materials.

8(b) No. The project is not located within one-quarter mile of an existing or proposed school.

8(c) No. Based on a comprehensive review of regulatory databases (see attached Hazards/Hazardous Materials references), the project site has not been subject to a release of hazardous substances. Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), and is not on or within 1,000 feet of a Formerly Used Defense Site.

8(d) No. The proposed project is not located within the boundaries of an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose

construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport.

- 8(e) No. The proposed project is not within one mile of a private airstrip.
- 8(f)(i) No. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN: The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.
- 8(f)(ii) No. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN: The property is not within the San Onofre emergency planning zone.
- 8(f)(iii) No. OIL SPILL CONTINGENCY ELEMENT: The project is not located along the coastal zone.
- 8(f)(iv) No. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN: The project would not alter major water or energy supply infrastructure which could interfere with the plan.
- 8(f)(v) No. DAM EVACUATION PLAN: The project is not located within a dam inundation zone.
- 8(g) No. The proposed project is adjacent to wildlands that have the potential to support wildland fires. However, the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project will comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code, as described in the approved Fire Protection Plan prepared for the project by J. Charles Weber, Fire and Life Safety Consultant. Also, a Fire Service Availability Letter dated November 24, 2014 has been received from the San Diego Rural Fire Protection District which indicates the expected emergency travel time to the project site to be 5 minutes which is within the maximum travel time allowed by the County Safety Element of the General Plan.
- 8(h) No. The project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses.

## **Conclusion**

As discussed above, the project would not result in any significant impacts to/from hazards/hazardous materials; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

## **HYDROLOGY AND WATER QUALITY**

The GPU EIR analysis indicated there would be the potential for direct and cumulative impacts from hydrological changes and to water quality associated with development of land uses proposed under the GPU. General Plan Update policies and mitigation measures would reduce impacts but not to below a level of significance.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>9. Hydrology and Water Quality – Would the Project:</b>			
a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k) Expose people or structures to a significant risk of loss,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

injury or death involving flooding?

l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?

☐ ☐ ☐

m) Inundation by seiche, tsunami, or mudflow?

☐ ☐ ☐

### Discussion

- 9(a) No. The project will require a NPDES General Permit for Discharges of Storm Water Associated with Construction Activities. The project applicant has provided a Standard Project Stormwater Quality Management Plan (SWQMP) which demonstrates that the project will comply with all requirements of the WPO. The project will be required to implement site design measures, source control BMPs, and/or treatment control BMPs to reduce potential pollutants to the maximum extent practicable. These measures will enable the project to meet waste discharge requirements as required by the San Diego Municipal Permit, as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP).
- 9(b) No. The project lies in the Jamul hydrologic subarea (910.33), within the Otay hydrologic unit (910.00). There are no impaired water bodies according to the Clean Water Act Section 303(d) list. The project will comply with the WPO and implement site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters.
- 9(c) No. As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances will ensure that project impacts are less than significant.
- 9(d) No. The project is a residential Tentative Parcel Map for residences which will involve minor temporary grading operations. The project will obtain its water supply from Otay Water District and will not use groundwater for any purposes. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.
- 9(e) No. As outlined in the project's SWQMP, the project will implement source control and/or treatment control BMP's to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff. These measures will control erosion and sedimentation and satisfy waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit (SDRWQCB Order No. R9-2007-0001), as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP). The SWMP specifies and describes the implementation process of all BMP's that will address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream drainage swales. The Department of Planning & Development Services will ensure that the Plan is implemented as proposed.
- 9(f) No. The project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons: the project is not proposing any

new development; and there are existing structures onsite. The subdivision is to create two legal lots for the two residences onsite.

- 9(g) No. The project does not propose to create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.
- 9(h) No. The project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs will be employed such that potential pollutants will be reduced to the maximum extent practicable.
- 9(i) No. No housing will be placed within a FEMA mapped floodplain or County-mapped floodplain or drainage with a watershed greater than 25 acres.
- 9(j) No. No 100-year flood hazard areas were identified on the project site or offsite improvement locations.
- 9(k) No. The project site lies outside any identified special flood hazard area.
- 9(l) The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately downstream of a minor dam that could potentially flood the property.

9(m)(i) SEICHE: The project site is not located along the shoreline of a lake or reservoir.

9(m)(ii) TSUNAMI: The project site is not located in a tsunami hazard zone.

9(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 6(a)(iv).

### **Conclusion**

As discussed above, the project would not result in any significant impacts to/from hydrology/water quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

The GPU EIR identified 24 mitigation measures to reduce potentially significant impacts related to Hydrology and Water Quality. Of the 24, the following six mitigation measures apply to the Shellstrom Tentative Parcel Map project as stated below:

- Hyd-1.2 requires the County to implement, and revise as necessary, the Watershed Protection Ordinance. In addition, the County must encourage the removal of invasive species and restore natural drainage systems. This measure reduces potential adverse effects of polluted runoff discharges to water bodies.
- Hyd-1.4 requires the County to implement, and revise as necessary, the Stormwater Standards Manual. This manual requires application of appropriate measures for land use with a high potential to contaminate surface water or groundwater resources. As such, this measure will reduce potential contribution to any violations of water quality standards from land use projects permitted by the County.
- Hyd-1.5 is the utilization of the County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. Application of these guidelines help County staff to identify and mitigate potential water quality impacts associated with public or private projects in the County.

- Hyd-1.9 requires the County to review septic system design, construction, and maintenance in cooperation with the Regional Water Quality Control Board (RWQCB) through the Septic Tank Permit Process. This coordination will minimize potential violation of water quality standards or waste discharge requirements since the RWQCB oversees the County's permitting process.
- Hyd-3.2 requires the County to implement and revise as necessary the Resource Protection Ordinance to limit development on steep slopes. It also incorporates the Hillside Development Policy into the Resource Protection Ordinance to the extent that it will allow for one comprehensive approach to steep-slope protections. By minimizing development on steep slopes, erosion and siltation impacts will be avoided.
- Hyd-3.3 is the implementation the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability. This ordinance includes many requirements to avoid erosion and siltation, such as: removal of loose dirt; installation of erosion control or drainage devices; inclusion and maintenance of sedimentation basins; planting requirements; slope stabilization measures; provision of drainage calculations; proper irrigation systems; etc.

The Shellstrom Tentative Parcel Map project has demonstrated compliance with these mitigation measures by obtaining approval of the Stormwater Management Plan, septic system design, and preliminary grading plan. These plans/studies will be further refined during final engineering for the project and/or implemented during project construction and operation.

## LAND USE AND PLANNING

The GPU EIR analysis indicated there would be the potential for direct and cumulative impacts from land use and planning associated with development under the GP. General Plan Update policies and mitigation measures reduce impacts to below a level of significance.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>10. Land Use and Planning – Would the Project:</b>			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

- 10(a) No. The project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area.
- 10(b) No. The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Jamul Dulzura Subregional Plan.



**Conclusion**

As discussed above, the project would not result in any significant impacts to land use/planning; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

**MINERAL RESOURCES**

The GPU EIR analysis indicated there would be the potential for direct and cumulative impacts to mineral resources from development of land uses proposed under the GPU. General Plan Update policies and mitigation measures would reduce impacts but not to below a level of significance. The following impacts were analyzed in the GPU EIR Mineral Resources Chapter and mitigation measures were proposed. However, the project does not have mineral resource impacts, and does not contribute to the GPU EIR determination that there is the potential to significantly impact mineral resources from the development of land uses proposed under the GPU.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>11. Mineral Resources</b> – Would the Project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

11(a) No. The project site has been classified by the California Department of Conservation – Division of Mines and Geology as MRZ-3. However, the project site is surrounded by rural residential uses which are incompatible with future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, the project will not result in the loss of a known mineral resource because the resource has already been lost due to incompatible land uses.

11(b) No. The project site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25).

**Conclusion**

As discussed above, the project would not result in any significant impacts to mineral resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

**NOISE**

The GPU EIR analysis indicated there would be the potential for direct and cumulative impacts from noise associated with development of land uses proposed under the GPU. General Plan Update policies and mitigation measures would reduce impacts but not to below a level of

significance. Impacts were analyzed in the GPU EIR Noise Chapter and mitigation measures were proposed. However, the project does not have noise impacts, and does not contribute to the GPU EIR determination that there is the potential to significantly impact the environment related to noise from the development of land uses proposed under the GPU.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>12. Noise – Would the Project:</b>			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

12(a) No. The project would not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

#### General Plan:

The project is subject to the County Noise Element which requires proposed exterior noise sensitive land uses to conform to the 60 dBA CNEL standard pursuant to Table N-1 and N-2. Primary noise sources to potentially impact the project would be from future traffic from Skyline Truck Trail and Lyons Valley Road. Based on in-house information, aerial photos, and GIS modeling, the future 60 dBA CNEL contour lines would fall on smaller portions of the site. These noise contours would fall outside of the proposed future residential pads and would not be exposed to noise levels of over 60 dBA CNEL. No noise easements are needed and the project demonstrates conformance with the Noise Element.

Noise Ordinance – Section 36-404:

Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project's property line. The project does not involve any permanent noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-409 & 36-310:

The project is also subject to the County Noise Ordinance which regulates temporary construction noise activities. A Noise Memorandum was prepared by Eilar Associates dated May 12, 2015 first received on September 10, 2015 and resubmitted on May 27, 2016. Based on this noise memo, construction activity requiring the use of heavy equipment would be limited to the grading of a steep slope at the front of the property, near the roadway. This is expected to take half a day. Noise generated from project grading is expected to be extremely brief in duration (less than two days) and are expected to remain below the applicable noise thresholds. No impulsive construction activities are proposed and construction activity is limited to the allowable hours of operation pursuant to the Noise Ordinance. Therefore, the project demonstrates conformance with County noise standards and no noise mitigation is required

- 12(b) No. The project proposes residences where low ambient vibration is essential for interior operation and/or sleeping conditions. However, the facilities are typically setback more than 50 feet from any County Circulation Element (CE) roadway using rubber-tired vehicles with projected groundborne noise or vibration contours of 38 VdB or less; any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 50 feet from the roadway centerline for heavy-duty truck activities would ensure that these proposed uses or operations do not have any chance of being impacted significantly by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995, Rudy Hendriks, Transportation Related Earthborne Vibrations 2002). This setback ensures that the project site will not be affected by any future projects that may support sources of groundborne vibration or groundborne noise related to the adjacent roadways.

The project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels and impact vibration sensitive uses in the surrounding area. Therefore, the project will not expose persons to or generate excessive groundborne vibration or groundborne noise levels on a project or cumulative level.

- 12(c) No. As indicated in the response listed under Section 12(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the project is not expected to expose existing or planned noise sensitive areas to direct and cumulative noise impacts over existing ambient noise levels.
- 12(d) No. The project is subject to the County Noise Ordinance which regulates temporary construction noise activities. A Noise Memorandum was prepared by Eilar Associates dated May 12, 2015 first received on September 10, 2015 and resubmitted on May 27, 2016. Based on this noise memo, construction activity requiring the use of heavy equipment would be limited to the grading of a steep slope at the front of the property,

near the roadway. This is expected to take half a day. Noise generated from project grading is expected to be extremely brief in duration (less than two days) and are expected to remain below the applicable noise thresholds. No impulsive construction activities are proposed and construction activity is limited to the allowable hours of operation pursuant to the Noise Ordinance. Therefore, the project demonstrates conformance with County noise standards and no noise mitigation is required.

12(e) No. The project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport.

12(f) No. The project is not located within a one-mile vicinity of a private airstrip.

### Conclusion

As discussed above, the project would not result in any significant impacts to/from noise; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

### POPULATION AND HOUSING

The GPU EIR analysis indicated there would be development and infrastructure proposed under the General Plan Update that would directly and indirectly induce population growth; however, this growth is consistent with forecasted growth for the unincorporated County. It indicated that the GP would not displace substantial numbers, but it would have the potential to result in displacement of people from the conversion of residential areas to other uses. These impacts were found to be less than significant and mitigation measures were not proposed.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>13. Population and Housing – Would the Project:</b>			
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

13(a) No. The project will not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area.

13(b) No. The project will not displace substantial numbers of existing housing. The existing house would be retained on site.

- 13(c) No. The proposed project will not displace a substantial number of people because the project site is currently vacant.

### Conclusion

As discussed above, the project would not result in any significant impacts to populations/housing; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

## PUBLIC SERVICES

The GPU EIR analysis indicated there would be the potential for direct and cumulative Public Service impacts associated with development of land uses proposed under the GPU. General Plan Update policies and mitigation measures would reduce impacts but not to below a level of significance. The project does not have public services impacts, and does not contribute to the GPU EIR determination that there is the potential to significantly impact services from the development of land uses proposed under the GPU.

### 14. Public Services – Would the Project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
----------------------------------	--	-----------------------------------

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

### Discussion

- 14(a) No. Based on the project's service availability forms, the project would not result in the need for significantly altered services or facilities.

### Conclusion

As discussed above, the project would not result in any significant impacts to public services; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

## RECREATION

The GPU EIR analysis indicated there would be the potential for direct and cumulative Recreational impacts associated with development of land uses proposed under the GPU. General Plan Update policies and mitigation measures would reduce impacts to less than significant.

### 15. Recreation – Would the Project:

a) Would the project increase the use of existing

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
----------------------------------	--	-----------------------------------

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

☐☐☐

### Discussion

15(a) No. The project may incrementally increase the use of existing parks and other recreational facilities; however, the project will be required to pay fees for local parks pursuant to the Park Land Dedication Ordinance.

15(b) No. The project does not include recreational facilities, such as trails and/or pathways, or require the construction or expansion of recreational facilities that could have a potential adverse effect on the environment.

### Conclusion

As discussed above, the project would not result in any significant impacts to recreation; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR. The project will be in compliance with GPU EIR mitigation measure REC-1.5 which requires the County to obtain funding for land acquisition and construction of recreational facilities in part by implementing the PLDO.

## TRANSPORTATION AND TRAFFIC

The GPU EIR analysis indicated there would be the potential for direct and cumulative Transportation and Traffic impacts associated with development of land uses proposed under the GPU. General Plan Update policies and mitigation measures would reduce impacts but not to below a level of significance.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
----------------------------------	--	-----------------------------------

### 16. Transportation and Traffic – Would the Project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

☐☐☐

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

☐☐☐

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in inadequate emergency access?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### Discussion

- 16(a) No. The project will result in an additional 20 average daily trips (ADT). The project will not conflict with any established performance measures. The project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian, or bicycle facilities.
- 16(b) No. The proposed project would result in an additional 20 ADT; therefore the project does not exceed the 2,400 trips (or 200 peak hour trips) required for study under the region's Congestion Management Program as developed by the San Diego Association of Governments (SANDAG).
- 16(c) No. The proposed project is located outside of an Airport Influence Area and is not located within two miles of a public or public use airport.
- 16(d) No. The proposed project will not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road.
- 16(e) No. The San Diego County Rural Fire Protection District and the San Diego County Fire Authority have reviewed the project and its Fire Protection Plan and have determined that there is adequate emergency fire access.
- 16(f) No. The project will not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities.

The GPU EIR imposed 25 mitigation measures for impacts to Traffic/transportation. Of the 25, the following five mitigation measures apply to the Shellstrom Tentative Parcel Map project as stated below:

- Tra-1.3 is the implementation of County Public Road Standards during review of new development projects. Tra-1.3 also includes revision of the Public Road Standards to include a range of road types according to Regional Category context. Application of this measure will ensure that LOS standards are met when feasible and that appropriate road types are assigned based the specifics of the development.

- Tra-1.4 is the implementation, and revision as necessary, of the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. This measure will ensure that appropriate site design and mitigating measures are applied to minimize traffic increases and road deficiencies associated with future development under the General Plan Update.
- Tra-1.7 is the implementation of the San Diego County Transportation Impact Fee (TIF) Ordinance, which defrays the costs of constructing planned transportation facilities necessary to accommodate increased traffic generated by future development. This measure will help reduce financial barriers associated with accommodating increased traffic and/or meeting LOS standards.
- Tra-4.2 is the implementation of Building and Fire Codes to ensure there are adequate service levels in place associated with the construction of structures and their accessibility and egress.
- Tra-4.4 requires the County to implement and revise as necessary the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards. This would ensure that new subdivision projects have adequate emergency response access.

### Conclusion

As discussed above, the project would not result in any significant impacts to transportation/traffic; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

### UTILITIES AND SERVICE SYSTEMS

The GPU EIR analysis indicated there would be the potential for direct and cumulative Utility and Service System impacts associated with development of land uses proposed under the GPU. General Plan Update policies and mitigation measures would reduce impacts but not to below a level of significance related to adequate water supplies and sufficient landfill capacity. The following impacts were anticipated in the GPU EIR Utilities and Service Systems Chapter and mitigation measures were proposed. However, the project does not have service impacts, and the GPU EIR determination that there is the potential to significantly impact existing or planned services from the development of land uses proposed under the GPU is not applicable to the project.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>17. Utilities and Service Systems – Would the Project:</b>			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### Discussion

- 17(a) No. The project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. Discharged wastewater must conform to the Regional Water Quality Control Board's (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS "to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities. DEH has reviewed the OSWS lay-out for the project and approved the project's OSWS on September 24, 2015. Therefore, the project is consistent with the wastewater treatment requirements of the RWQCB as determined by the authorized, local public agency.
- 17(b) No. The project involves new water and wastewater pipeline extensions. However, these extensions will not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.
- 17(c) No. The project does not involve construction of new storm water drainage facilities.
- 17(d) No. A Service Availability Letter from the Otay Water District has been provided which indicates that there is adequate water to serve the project.
- 17(e) No. The proposed project will rely completely on a private septic system for each parcel; therefore, the project will not interfere with any wastewater treatment provider's service capacity and a Service Availability Letter from a sewer district is not required.
- 17(f) No. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the

Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are five, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

- 17(g) No. The project will deposit all solid waste at a permitted solid waste facility and therefore, will comply with Federal, State, and local statutes and regulations related to solid waste.

### **Conclusion**

As discussed above, the project would not result in any significant impacts to utilities and service systems; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR. The GPU EIR identified mitigation measures to reduce potentially significant impacts related to Utilities and Service Systems. Only the following mitigation measure applies to the Shellstrom Tentative Parcel Map project as stated below:

- USS-4.3 is the implementation of Policy I-84 requiring that discretionary projects obtain commitment from the applicable water district that water services are available. This will prevent future discretionary projects in water district areas that require imported water supply in exceedance of existing availability.

The Shellstrom Tentative Parcel Map project has demonstrated compliance with this mitigation measure by obtaining a service availability form from the Otay Municipal Water District for water service.

### **Attachments:**

Appendix A – References

Appendix B – Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067

## Appendix A

The following is a list of project specific technical studies used to support the analysis of each potential environmental effect:

Biological Summary Report prepared by Vincent N. Scheidt, Biological Consultant (November 2015).

Fire Protection Plan prepared by J. Charles Weber, Fire and Life Safety Consultant (May 9, 2015).

Geology Report prepared by Michael W. Hart, Engineering Geologist (April 30, 2015).

Noise Information Memorandum prepared by Amy Hool and Jonathan Brothers, Eilar Associates, Inc. (May 12, 2015).

Standard Stormwater Quality Management Plan prepared by Elliot May (July 2016)

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the General Plan Update Final Certified Program EIR, dated August 3, 2011, please visit the County's website at:

[http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_5.00 -  
\\_References\\_2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf)

## Appendix B

A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:

[http://www.sdcountry.ca.gov/pds/gpupdate/GPU\\_FEIR\\_Summary\\_15183\\_Reference.pdf](http://www.sdcountry.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf)